



13 April 2009

To whom it may concern,

American Roamer, LLC, a Tennessee Limited Liability Corporation involved in research and marketing services for the wireless telecommunications industry is pleased to respond to the President's and Congress' request for input for the implementation of the American Recovery and Reinvestment Act of 2009 (ARRC) through its intended establishment of the Broadband Technology Opportunities Program (BTOP). American Roamer, in collaboration with MediaBiz (separately, but collaboratively, also filing today), is pleased to demonstrate that private companies can provide a current "baseline" interactive map showing the deployment of broadband availability and coverage of both wireless and wireline (including cable modem and digital subscriber line).

American Roamer is responding, in particular, to the request for input on "Broadband Mapping" for the National Telecommunications Information Agency (NTIA) and the Rural Utility Services (RUS).

Qualifications and Experience:

For over 20 years, American Roamer has been tracking and mapping the wireless telecommunications business throughout North America. In 1988, we published our first product, a roaming guide, required by cellular telephone subscribers desiring to use their service while traveling. Before call forwarding services were automatic, every city had separate instructions for both making and receiving calls. Our guides detailed these instructions based upon the subscriber's home service provider. By establishing relationships with every wireless operator, we assembled a complete picture of cellular service availability across the continent.

Mapping was a natural extension of our initial business. Realizing we were collecting this data, our clients asked us to create their coverage maps and, in the process, began supplying us with more detailed patterns. In order to provide a true national footprint, every wireless operator in the United States requires roaming agreements with other operators. American Roamer is the central repository of coverage information and most carriers depend on us to manage and create the coverage they market to the public.

Our WISARD service, launched nearly a decade ago, has become the wireless industry's premier web-based research application. It offers users the ability to search by nation, city and state, carrier, postal code, market name or number, protocol and more. Interactive maps allow for viewing of coverage patterns for every commercially launched carrier in North America and indicate 3G availability with a separate color scheme. This service can also be customized for specific needs including a version that we maintain for the Department of Homeland Security.

The patterns that are incorporated into our WISARD service and the custom maps we create for the carriers are also available in GIS format. Known as CoverageRight and MarketRight, these file sets are available in several common formats. Separate patterns are maintained for each type of service such as voice and broadband data for all GSM, CDMA, iDEN and WiMax systems. In addition to private industry clients, the FCC (Federal Communications Commission) utilizes these products to assist them in researching the industry they are charged with regulating.

Perhaps even more relevant, our on-line, interactive mapping application, CellMaps, is capable of showing all of the wireless service availability mentioned above in conjunction with the wired systems tracked and maintained by MediaBiz. This mapping engine is fully customizable. Additional data can be incorporated as required such as points of interest, tower locations, customer service centers or any other relevant material deemed necessary by NTIA, RUS and other stakeholders.

Please see the included documents (1) AR_Overview.pdf (2) WISARD_v200901.pdf, (3) CellMaps_v200901.pdf, and (4) AR-MB_Sample_Broadband_Map.jpg, a sample combined broadband deployment map showing data from both American Roamer (wireless broadband coverage) and MediaBiz (wireline including cable modem, telephone digital subscriber line as well as telephone FiOS and U-Verse deployment) in the selected counties of Oneida and Bannock, Idaho.

A demonstration of our web-based mapping applications as well as an example showing wired and wireless broadband overlays can be arranged at the convenience of the NTIA and RUS.

Third Party Recommendation:

Based on our years of experience with data collection and mapping as well as with government agencies as outlined, American Roamer (and, separately but collaboratively, MediaBiz) strongly believes and urges NTIA and RUS to value the role that private companies such as ours already serve in identifying and defining the availability of wireless broadband (and, in the case of MediaBiz, broadband internet and multichannel video).

The requirements and mechanisms you set forth should not only allow, but encourage, private companies to be able to work directly or to collaborate with federal agencies, states, local governments and BTOP grantees to accelerate the realization of the Administration's intent in the ARRC, as well as the Broadband Data Improvement Act.

Furthermore, the prospect of a comprehensive, interactive and searchable tool with the functionality, breadth and granularity not previously available has exciting potential and we look forward to the opportunity to design, deploy and maintain this important tool. The statutes and your own RFI anticipate that such a result could be years away. Please know and appreciate that a large portion of the desired data – not to mention the interactive mapping tool – already exists to allow the BTOP to get underway without having to wait another minute.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Bryan Darr", with a stylized, flowing script.

Bryan Darr
President
American Roamer, LLC